



Puget Sound Clean Air Agency

1904 3rd Ave SU 105
Seattle, WA 98101
phone 206-343-8800/1-800-552-3565
fax 206-343-7522 www.pscleanair.org

Written Warning

No. 2-008170

Case No.	Registration No. 11339	Violation Date: December 2007 CEM Report	
Certified Mail No.:	Name Ash Grove Cement Co.	Responsible Person, Title Gerald Brown, EH&S Manager	
Location of Violation (Address) 3801 E. Marginal Way So.	City Seattle, WA	Zip 98134	County King
Mailing Address As Above	City, State Seattle, WA	Zip 98134	Phone (206) 623-5596

Violation of AOP No. 11339 issued on 5/15/2004 Part II.C.4 (f) Ash Grove shall include with the monthly CEM reports the results of all cylinder gas audits conducted during the month

Violation Description

Ash Grove submitted a brief summary of the cement kiln main stack CERMS CGA and RAA for December 11th 2007 and December 13th 2007. This report was submitted with the December 2007 CEM report that was received by this Agency on January 31, 2008. The compressed gas audit summary results did not include the level of detail and specificity as required by this Agency.

Corrective Action Order

If you do not take the corrective action described below to comply with the regulations of the Puget Sound Clean Air Agency, the Agency may issue a Notice of Violation that may result in a civil penalty.

- ☒ **Within 10 days of your receipt of this notice, submit the results of the December CGA test in the format of the enclosed form. Please include the level of detail required by this form in all future CGA reports submitted to this Agency.**

Issued by:


Elizabeth Gilpin, Inspector, 206-689-4026

Date/Time:

2.28.08

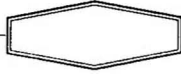
Received by

signature

print name

Signing this document is not an admission of guilt

ASH GROVE CEMENT COMPANY



"WESTERN REGION"

March 6, 2008

Puget Sound Clean Air Agency
Attn: Elizabeth Gilpin
1904 3rd Avenue, Suite 105
Seattle, WA. 98101

Dear Elizabeth:

Enclosed is the summary of the main stack CERMS CGA and RAA for December 11 and 13, 2007 as required by Written Warning No. 2-008170. I apologize for the oversight.

Gerald J. Brown
EHS Manager

3. SUMMARY OF RESULTS

The tests show that the CERMS met the RAA requirements in PS 6 and Appendix F. According to Appendix F, compliance is indicated if the relative differences between the means of the RM and CERMS values are within 15% of the three run average. RAA results are summarized in Table 1.

The tests also show that the CERMS met the CGA requirements in Appendix F that the results are within 15% of the average audit values or within 5 ppm, whichever is greater. CGA results are in Table 2. All of the analyzers passed on one or both criteria.

3.1 Tables of Results

Table 1
Rotary Cement Kiln Main Stack - RAA Results

Test Date: December 13, 2007	Results
Flow Rate (dscf/min)	
CERMS Mean Value	124,726
RM (Horizon) Mean Value	125,817
Accuracy (Relative Difference), based on mean value (%)	
Relative Difference	0.9
Allowable Relative Difference	15
Result	Pass

Table 2
Rotary Cement Kiln Main Stack - CGA Results

Test Date: December 11, 2007	Units	Audit Pt. 1	Audit Pt. 2	Allowable Limit
CO Hartman & Braun, 2000 ppm		<u>20-30% of span</u>	<u>50-60% of span</u>	
Certified Audit Value	ppm	459	1131	
Percent of Span	%	23	57	
Average Test Audit Value	ppm	468	1132	
Accuracy, % Difference	%	2.0	0.1	15
Result		Pass	Pass	
NO_x Hartman & Braun, 2000 ppm				
Certified Audit Value	ppm	471	1122	
Percent of Span	%	24	56	
Average Test Audit Value	ppm	477	1127	
Accuracy, % Difference	%	1.2	0.4	15
Result		Pass	Pass	
SO₂ Ametek, 200 ppm				
Certified Audit Value	ppm	52.2	111.0	
Percent of Span	%	26	56	
Average Test Audit Value	ppm	53	113	
Accuracy, % Difference	%	1.5	2.1	15
Result		Pass	Pass	
O₂ Hartman & Braun, 25%		<u>4-6% O₂</u>	<u>8-12% O₂</u>	
Certified Audit Value	%	4.98	9.06	
Average Test Audit Value	%	5.0	9.1	
Accuracy, % Difference	%	0.5	0.3	15
Result		Pass	Pass	



Puget Sound Clean Air Agency
Written Warning

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Seattle, WA 98101-2038
Ph: 206.343.8800 / 1.800.552.3565
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Inspection Date: 3/7/08
No 2-001415
Time: 10:10 AM

Case/Registration No. RA 11339	Name Ash Grove Cement Co.		Responsible Person, Title Gerald Brown	
Site Address 3801 E. Marginal Way So.		City Seattle	Zip 98134	County King
Mailing Address		City, State	Zip	Phone (206) 694-6221

Regulations Violated:

~~AOP 11339 issued 5/15/2004 part N Performance Testing. Notify Agency in writing at least 2 weeks prior to Any Compliance Test.~~

~~On 2/25/07 Ash Grove sent an e-mail to the Agency stating the Method 5 particulate stack test originally scheduled for 2/28/08 would be conducted on Friday March 7th instead. Per voice mail from Gerry Brown to E. Gilpin on 3/6/08, Horizon Engineering was on-site performing this test on 3/6/08. Failure to provide 2 weeks prior notice.~~

If you do not take the corrective action described below to comply with the regulations of the Puget Sound Clean Air Agency, the Agency may issue a Notice of Violation that may result in a civil penalty.

☒ By within 10 days submit a written report describing the action you have taken to correct this violation and achieve compliance with agency regulations.

☐ By _____, you must: _____

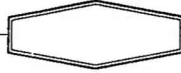
Issued By: Elizabeth Gilpin Received By: [Signature]
Signing this is not an admission of guilt

Date/Time: 3/07/08 10:05 AM
Form No. 70-121-1 (12/00) MAM

Certified Mail Number

AGCS2M003768

ASH GROVE CEMENT COMPANY



"WESTERN REGION"

March 11, 2008

Ms. Elizabeth Gilpin
Puget Sound Clean Air Agency
1904 3rd Avenue, Suite 105
Seattle, WA. 98101

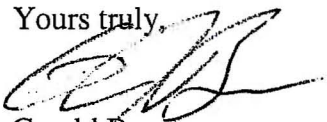
Dear Ms. Gilpin:

Per the written warning issued 3/07/08 for not providing adequate written notice for a performance test.

Along with written notice initially given to the agency for all required performance tests conducted at the Seattle Plant, a written notification with explanation will be given to the Agency for any delays or changes to the announced test date as soon as possible prior to the test.

Please advise if you have additional recommendations.

Yours truly,



Gerald Brown
Manager EHS

AGCS2M003769